

Serial No. 10/617,252

REMARKS**INTRODUCTION**

In accordance with the foregoing, claims 3-5, and 9 have been canceled, without prejudice or disclaimer, and claims 1, 10, 12-14 and 16-19 have been amended. No new matter has been presented.

Claims 1, 2, 6-8, and 10-26 are pending, with claims 1, 2, 6-8, and 10-19 being under consideration.

REJECTIONS UNDER 35 USC 102

Claim 1 stands rejected under 35 U.S.C. 102(b) as being anticipated by Komuro et al., U.S. Patent No. 4,873,622, claim 1 stands rejected under 35 U.S.C. 102(e) as being anticipated by Patil et al., U.S. Patent No. 6,425,655, and claim 1 stands rejected under 35 U.S.C. 102(e) as being anticipated by Akhavain et al., U.S. Patent No. 6,543,880.

In view of the incorporation of claim features from previously dependent claims, rejected under 35 USC § 103, into independent claim 1, it is respectfully submitted that these rejections are now moot.

REJECTIONS UNDER 35 USC 103

Claims 2-19 stand rejected under 35 U.S.C. 103(a) as being obvious over Patil et al., in view of Asano, U.S. Patent No. 6,396,665. This rejection is respectfully traversed.

By way of review and as an example, independent claim 1 sets forth:

"[a]n ink-jet printhead comprising:
a substrate which includes an ink chamber where ink is stored, nozzles through which ink in the ink chamber is ejected, and a plurality of pads which apply an electrical signal to the substrate to generate droplets in the ink chamber;
a flexible printed circuit (FPC) cable which includes a conductor corresponding to each of the pads, each conductor having bonding portions at front ends thereof; and
connection members which electrically connect the pads to the bonding portions,
wherein a connection member is bonded to a corresponding pad of the substrate and/or a corresponding bonding portion of the FPC by hot pressure welding."

The Office Action has indicated that Patil et al. fails to disclose "the FPC includes a

Serial No. 10/617,252

protection layer, protecting the conductor, having an opening through which the bonding portions are exposed is provided in the protection layer and one end of each pad, one end of each connection member and one end of the bonding portions are bonded to each other by hot pressure welding or soldering."

The Office Action further indicates that it would have been obvious to modify Patil et al. to include the claimed bonding by hot pressure welding "for the purpose of reinforcing the connection strength through the connecting end portions and the FBC."

However, it is respectfully submitted that there is no evidence in the record that there would have been any motivation for the suggested modification of Patil et al. In particular, it is respectfully submitted that the Office Action has merely set forth features Asano and set forth that the addition of the same into Patil et al. would have been obvious so Patil et al. would include such features, without support in the record.

It is respectfully submitted that none of the cited references provide any support or evidence that there would be a need or desire to modify Patil et al. as suggested. In addition, nothing in the record provides any evidence or suggestion that Patil et al. needs or desires the suggested "reinforcing the connection strength through the connecting end portions and the FBC."

Rather, the cited motivation is unsupported by the record and derives solely from the opinion of the Examiner.

MPEP § 2142 states that "it is the duty of the Examiner to explain why the combination of the teachings is proper." The Examiner is required to present actual evidence and make particular findings related to the motivation to combine the teachings of the references. In re Kotzab, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000); In re Dembiczak, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999). Broad conclusory statements regarding the teaching of multiple references, standing alone, are not "evidence." Dembiczak, 50 USPQ2d at 1617.

The factual inquiry must be based on objective evidence of record, and cannot be based on subjective belief and unknown authority. Id. at 1433-34. The Examiner must explain the reasons that one of ordinary skill in the art would have been motivated to select the references and to combine them to render the claimed invention obvious. In re Rouffet, 47 USPQ2d 1453, 1459 (Fed. Cir. 1998).

Further, despite the Office Action's attempt to evidence the obviousness modification rationale by relying on an unsupported motivation, it is well settled that "the Board [and

Serial No. 10/617,252

Examiner] cannot simply reach conclusions based on [their] own understanding of experience - or on [their] assessment of what would be basic knowledge or common sense. Rather the Board must point to some concrete evidence in the record in support of these findings." In re Zurko, 258 F. 3d 1379, 1386, 59 USPQ2d 1693, 1697 (Fed. Cir. 2001). See also In re Lee, 277 F. 3d 1338, 1344-45, 61 USPQ2d 1430, 1434-35 (Fed. Cir. 2002), in which the court required evidence for the determination of unpatentability by clarifying that the principles of "common knowledge" and "common sense" may only be applied to the analysis of evidence, rather than be a substitute for evidence.

Thus, accordingly, a prima facie obviousness rejection requires evidenced motivation from something in the record that would lead one skilled in the art to combine the relevant teachings. The mere fact that the prior art may be modified in a particular manner does not make the modification obvious unless the prior art suggested the desirability of that modification.

Therefore, it is respectfully submitted that there would not have been motivation to modify Patil et al. as suggested.

Rather, it is respectfully submitted that the present invention has a particular orientation of the connector, and particularly explains how the connector can connect to each of the pad or bonding portions. In particular, the notch implemented by the present invention created by the claimed opening permits the use of the claimed hot pressure welding.

Conversely, none of the cited references, including Patil et al., have an orientation susceptible for such the claimed "wherein a connection member is bonded to a corresponding pad of the substrate and/or a corresponding bonding portion of the FPC by hot pressure welding"

Similarly, the Office Action has failed to support the conclusion that Patil et al. is even modifiable for the Office Action's proffered modification.

Thus, It is respectfully submitted that it would not have been obvious to modify Patil et al. to disclose the presently claimed invention.

Therefore, for at least the above, it is respectfully requested that the outstanding rejections be withdrawn and the presently claimed invention be allowed.

Serial No. 10/617,252

CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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